IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

THE LUTHERAN CHURCH – MISSOURI	§	
SYNOD, a Missouri nonprofit corporation	§	
Plaintiff,	§	
	§	Case No. 1:23-cv-1042-DAE
V.	§	
	§	
DONALD CHRISTIAN, CHRISTOPHER	§	
BANNWOLF, CONCORDIA	§	
UNIVERSITY TEXAS, INC., & JOHN	§	
DOES 1-12	§	
Defendants	§	

UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiff, The Lutheran Church – Missouri Synod, a Missouri nonprofit corporation, submits the following Unopposed Motion for Extension of Time.

- 1. On September 12, 2024, Defendant Concordia University Texas ("CTX") filed an Unopposed Motion for Leave to Exceed Page Limit (Doc. 37), attaching a proposed Motion for Protective Order (Doc. 37-1). The Court granted the motion to exceed page limit with a text order.
- 2. On September 16, 2024, non-parties Alan Taylor, Nathaniel Hill and Thomas Zachman filed a Motion to Quash, Motion for Protective Order and Notice of Non-Appearances (Doc. 38).
- 3. On September 16, 2024, the Motion for Protective Order (Doc. 39) attached to the Unopposed Motion for Leave to Exceed Page Limit (Doc. 37) was filed by the Defendants.
- 4. Pursuant to Local Rule CV-7, LCMS has 10 days from the filing of each motion to submit a response. LCMS requires additional time to respond to the two motions for protective order (*i.e.*, the motions filed as Doc. 38 and Doc. 39).

5. LCMS has conferred with counsel for CTX, and counsel for non-parties Taylor, Hill and Zachman. Counsel have agreed to extend LCMS's deadline to respond to the motions, to October 11, 2024.

WHEREFORE, LCMS requests the Court grant additional time, to October 11, 2024, for LCMS to respond to the Motion for Quash & Motion for Protective Order (Doc. 38), and the Motion for Protective Order (Doc. 39).

Respectfully submitted,

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Attorneys For Plaintiff
The Lutheran Church – Missouri Synod

CERTIFICATE OF CONFERENCE

I hereby certify before filing the foregoing motion, I conferred with Dan Richards, counsel for Defendants, and with Monica Perez, counsel for non-parties, Taylor, Hill and Zachman. Mr. Richards and Ms. Perez advised me they agree to the requested extension of time.

/s/ Steven C. Levatino
Steven C. Levatino

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of September, 2024, I electronically filed the above and foregoing document. I understand the CM/ECF system will send a Notice of Electronic Filing to all counsel of record.

/s/ Steven C. Levatino
Steven C. Levatino